

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
District of NebraskaUnited States of America
v.

Case No. 8:21MJ142

JOURDAIN HYMAN ST CYR

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 4, 2021 in the county of Thurston in the
District of Nebraska, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 111

Assault of a federal officer in Indian Country

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.☐ Sworn to before me and signed in my presence.☒ Sworn to before me by telephone or other reliable
electronic means.Date: 3/5/2021City and state: Omaha, Nebraska
Complainant's signature

SA Stephen Friend, FBI

Printed name and title
Judge's signature

Michael D. Nelson, U.S. Magistrate

Printed name and title

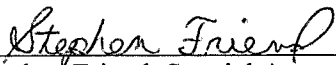
**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA
AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

The undersigned, being duly sworn, deposes and says:

1. Your affiant, Stephen Friend is a Special Agent (SA) with the Federal Bureau of Investigation (FBI) currently assigned to the Sioux City, Iowa, Resident Agency of the Omaha, Nebraska, FBI Division. In the course of his official duties, your affiant is charged with the investigation of crimes occurring on the Winnebago Indian Reservation and Omaha Nation Indian Reservation, within the District of Nebraska, to include assault of a federal officer in Indian Country, in violation of Title 18, United States Code, Section 111.
2. This affidavit is in support of a criminal complaint and arrest for Mr. JOURDAINE ST CYR (hereafter, "ST CYR"), Indian male, year of birth 1995. The following information was related to your affiant by an FBI investigation and by Winnebago Police Department (WPD), Omaha Nation Law Enforcement Services (ONLES), Dakota County Sheriff's Office (DCSO), Thurston County Sheriff's Office (TCSO), and Nebraska State Patrol (NSP) in connection with an assault investigation.
3. On March 4, 2021, WPD attempted a welfare check of ST CYR. ST CYR's sister, Ms. JERILEE ST CYR (hereafter "JERILEE"), was concerned because he was having a difficult time coping with his father's recent death. JERILEE told WPD that ST CYR had a pistol and told her that he planned to "end it all."
4. WPD contacted ST CYR's girlfriend and mother of his children, Ms. LATASHA NORTON (hereafter, "NORTON"). NORTON advised that ST CYR was coping with his father's death. ST CYR also recently admitted to sexually assaulting one of their daughters. ST CYR told NORTON that he perpetrated the assault because he is "fucked up." ST CYR called NORTON on March 4, 2021. He told her that he was going to "end it" and requested that NORTON tell their children that he loved them. NORTON was asked by WPD Officer Melvin Whitebird if ST CYR had a gun and NORTON stated apparently, he did, but she had never seen it.
5. On March 4, 2021, WPD located ST CYR inside his vehicle at approximately 10:49 AM. The vehicle is a blue 2007 Hummer H3. The vehicle was parked at the Catholic cemetery in Winnebago, Nebraska. When WPD attempted to speak with ST CYR, he disobeyed their commands and drove away from the scene.
6. WPD, ONLES, and TCSO engaged in a vehicle pursuits with ST CYR. The pursuit occurred within the boundaries of the Winnebago Indian Reservation and Omaha Nation Indian

Reservation. During the pursuit, ST CYR evaded stop sticks and narrowly missed striking law enforcement officers on two occasions. The vehicle pursuit was in excess of speeds of 70 miles per hour. The pursuit terminated on 29 Road when ST CYR's vehicle overturned into a drainage ditch. When officers attempted to contact ST CYR, he pointed a pistol at them. On-scene officers requested the assistance of DCSO, NSP, and FBI.

7. NSP negotiated ST CYR's surrender after approximately 6 hours. During negotiations, ST CYR made continuous threats to shoot and kill police officers. ST CYR surrendered to DCSO SWAT. His pistol was collected as evidence. It was determined to be a BB gun.
8. The events described in paragraphs 1 through 7 occurred on the Winnebago Indian Reservation and Omaha Nation Indian Reservation, in Indian Country, in the District of Nebraska. Mr. JOURDAIN ST CYR is an enrolled member of the Winnebago Tribe of Nebraska. Based upon the aforementioned information, your affiant believes a violation of federal law has occurred, to wit; assault of a federal officer in Indian Country, in violation of Title 18, United States Code, Section 111.


Stephen Friend, Special Agent
Federal Bureau of Investigation

Sworn to before me by telephone or other reliable electronic means:

Date: March 5, 2021

City and State: Omaha, Nebraska


Michael D. Nelson, U.S. Magistrate Judge